## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

520 S. MICHIGAN AVENUE ASSOCIATES, LTD d/b/a THE CONGRESS PLAZA HOTEL & CONVENTION CENTER,	) ) )
Plaintiff,	)
VS.	) Case No. 10 CV 1395
UNITE HERE National Retirement Fund,	) ) Judge Kennelly
Defendant.	)

## NOTICE OF MOTION

To: Ronald E. Richman

Shannon Cade Schulte Roth & Zabel, LLP

919 Third Avenue

New York, NY 10022

Michele M. Reynolds

Kara R. Eisen Ronald M. Willis

Dowd, Bloch & Bennett

8 S. Michigan Ave., 19th Floor

Chicago, IL 60603

PLEASE TAKE NOTICE, that on the 6th day of April, 2010, at the hour of 9:30 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Judge Matthew F. Kennelly, or any Judge sitting in his stead in room 2103 of the United States District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, IL 60604 and shall then and there present the foregoing Motion For Turnover Order, a copy of which is attached hereto.

Respectfully submitted, Peter Andjelkovich & Associates

By: /s/ Peter Andjelkovich
One of Plaintiff's attorneys

Bradley Wartman, Esq. Peter Andjelkovich, Esq. Peter Andjelkovich & Associates 39 South LaSalle Street, Suite 200 Chicago, IL 60603 312/782-8345

## CERTIFICATE OF SERVICE

I, Peter Andjelkovich, an attorney, hereby certify that the above and foregoing Motion For Turnover Order was served upon all counsel of record listed below by CM/ECF electronic transmission on this 31st day of March, 2010.

Ronald E. Richman Shannon Cade Schulte Roth & Zabel, LLP 919 Third Avenue New York, NY 10022

Michele M. Reynolds Kara R. Eisen Ronald M. Willis Dowd, Bloch & Bennett 8 S. Michigan Ave., 19<sup>th</sup> Floor Chicago, IL 60603

By: /s/Peter Andjelkovich